

AO 440 (Rev 10/93) Summons in a Civil Action - SDNY WEB 4/99

United States District Court

Southern DISTRICT OF New York

DALIA NAUTA (AND HUSBAND, LUIS NAUTO)

SUMMONS IN A CIVIL CASE

v.

CASE NUMBER: (AKH)
110-01-0105

110 CHURCH LLC, ET. AL.,

SEE ATTACHED RIDER,

TO: (Name and address of defendant)

SEE ATTACHED RIDER

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
115 Broadway, 12th Floor
New York, New York 10006
212-267-3700

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

J. MICHAEL McMAHON

CLERK

(BY) DEPUTY CLERK

JAN 31 2008

DATE

AO 440 (Rev 10/93) Summons in a Civil Action - SDNY WEB 4/99

RETURN OF SERVICE

Service of the Summons and Complaint was made by me ¹	DATE
NAME OF SERVER (PRINT)	TITLE

Check one box below to indicate appropriate method of service

Served personally upon the defendant. Place where served: _____

Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person with whom the summons and complaint were left: _____

Returned unexecuted: _____

Other (specify): _____

STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____

Date _____

Signature of Server _____

Address of Server _____

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure

RIDER

DALIA NAUTA AND LUIS NAUTO,

Plaintiffs,

- against -

ON-SITE:

7 WORLD TRADE COMPANY, L.P.; A RUSSO WRECKING, INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC.; ATLANTIC HEYDT CORP.; BECHTEL ASSOCIATES PROFESSIONAL CORPORATION; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERKEL & COMPANY, CONTRACTORS, INC.; BIG APPLE WRECKING & CONSTRUCTION CORP; BOVIS LEND LEASE LMB, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION CORP.; BURO HAPPOLD CONSULTING ENGINEERS, P.C.; C.B. CONTRACTING CORP; CANRON CONSTRUCTION CORP.; CORD CONTRACTING CO., INC.; DAKOTA DEMO-TECH ; DIAMOND POINT EXCAVATING CORP ; DIEGO CONSTRUCTION, INC.; DIVERSIFIED CARTING, INC.; DMT ENTERPRISE, INC. D'ONOFRIO GENERAL CONTRACTORS CORP.; EAGLE LEASING & INDUSTRIAL SUPPLY, INC.; EAGLE ONE ROOFING CONTRACTORS INC; EJ DAVIES, INC.; EN-TECH CORP.; EVERGREEN RECYCLING OF CORONA(EROC); EWELL W. FINLEY, P.C.; EXECUTIVE MEDICAL SERVICES, P.C.; FLEET TRUCKING, INC.; FRANCIS A. LEE EXTERIOR RESTORATION, INC.; FTI TRUCKING, INC.; GILSANZ, MURRAY, & STEFICEK, LLP, GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC.; HALLEN WELDING SERVICE, INC.; H.P. ENVIRONMENTAL; KOCH SKANSKA INC; LAQUILA CONSTRUCTION INC.; LASTRADA GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGIINEERS P.C.; LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.; NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC.; PINNACLE ENVIRONMENTAL CORP.;PLAZA CONSTRUCTION CORP.; PRO SAFETY SERVICES LLC.; PT & L CONTRACTING CORP.; ROBER SILMAN ASSOCIATES; ROBERT L. GEROSA, INC.; RODAR ENTERPRISES, INC.; ROYAL GM, INC; SAB TRUCKING INC.; SAFEWAY ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL CONTRACTING; SEMCOR EQUIPMENT & MANUFACTURING CORP.; SILVERITE CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEGER INC.; SKIDMORE, OWING & MERRILL LLP; SURVIAIR; TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC.; TORRETTA TRUCKING, INC.; TOTAL SAFETY CONSULTING, L.L.C.; TUCCI EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION CO., INC.; TURNER CONSTRUCTION COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT VENTURE); VERIZON NEW YORK INC; VOLLMER ASSOCIATES LLP.; WEEKS MARINE, INC.; WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.; WHITNEY CONTRACTING INC.; WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE CENTER PROPERTIES LLC.; WSP CANTOR SEINUK; YANNUZZI & SONS, INC; YONKERS CONTRACTING COMPANY, INC.; YORK HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC.,

OFF-SITE:

110 CHURCH LLC, 233 BROADWAY OWNERS, LLC, 50 TRINITY, LLC, 53 PARK PLACE LLC, 88 GREENWICH LLC, 90 CHURCH STREET LIMITED PARTNERSHIP, ALAN KASMAN DBA KASCO, AMBIENT GROUP, INC., ANN TAYLOR STORES CORPORATION, BANKERS TRUST COMPANY, BATTERY PARK CITY AUTHORITY, BELFOR USA GROUP, INC., BFP ONE LIBERTY PLAZA CO., LLC., BLACK DIAMONDS LLC, BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT, BOSTON PROPERTIES, INC., BROADWAY WEST STREET ASSOCIATES LIMITED PARTNERSHIP, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., BT PRIVATE CLIENTS CORP., DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HIGHLAND DEVELOPMENT LLC, HILLMAN ENVIRONMENTAL GROUP, LLC., INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., LIONSHEAD 110 DEVELOPMENT LLC, LIONSHEAD DEVELOPMENT LLC, MERRILL LYNCH & CO, INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, STEEPLECHASE ACQUISITIONS LLC, STRUCTURE TONE (UK), INC., STRUCTURE TONE

GLOBAL SERVICES, INC., THE BANK OF NEW YORK TRUST COMPANY NA, THE BOARD OF MANAGERS OF THEONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN INTERIORS CORPORATION, TISHMAN SPEYER PROPERTIES, TOSCORP INC., TUCKER ANTHONY, INC., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC, V CUCINIELLO, VERIZON NEW YORK, INC, WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, W, ET AL

Defendants.

X

Defendants' Addresses:

ON-SITE:

7 WORLD TRADE COMPANY, L.P. Carb, Luria, Glassner, Cook & Kufeld 529 Fifth Avenue New York, NY 10017 C/O Edward Tanenhouse, Esq.	DIVERSIFIED CARTING, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	MORETRENCH AMERICAN CORPORATION C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN C/O Cozen O'Connor 1 Newark Center, Suite 1900 Newark, NJ 07102
7 World Trade Center 38th Floor New York, NY 10048	DMT ENTERPRISE, INC. 255 Lake Avenue Yonkers, NY 10701	MRA ENGINEERING P.C., 600 Hempstead Turnpike West Hempstead, NY 1152-1036	TISHMAN CONSTRUCTION CORPORATION OF NEW YORK C/O Cozen O'Connor 1 Newark Center, Suite 1900 Newark, NJ 07102
A RUSSO WRECKING C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	EAGLE LEASING & INDUSTRIAL SUPPLY 1726 FLATBUSH AVENUE BROOKLYN, NY 11210	MUESER RUTLEDGE CONSULTING ENGINEERS C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	TISHMAN INTERIORS CORPORATION C/O Daniel R. Tishman 666 5th Avenue New York, NY 10103
ABM INDUSTRIES, INC. C/O JEFFERY SAMEL & PARTNERS 150 BROADWAY 20 TH FLOOR NEW YORK, NEW YORK 10038	EAGLE ONE ROOFING CONTRACTORS INC., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	NACIREMA INDUSTRIES INCORPORATED 211 West 5 th Street Bayonne, NJ 07002	TISHMAN SPEYER PROPERTIES C/O Daniel R. Tishman 666 5th Avenue New York, NY 10103
ABM JANITORIAL NORTHEAST, INC. C/O JEFFERY SAMEL & PARTNERS 150 BROADWAY 20 TH FLOOR NEW YORK, NEW YORK 10038	EJ DAVIES, INC., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	NEW YORK CRANE & EQUIPMENT CORP. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	THORTON-TOMASETTI GROUP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102
AMEC CONSTRUCTION MANAGEMENT, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	EN-TECH CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	NICHOLSON CONSTRUCTION COMPANY C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	TORRETTA TRUCKING, INC 120 MOUNTAINVIEW AVENUE STATEN ISLAND, NY 10314
AMEC EARTH & ENVIRONMENTAL, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	EVERGREEN RECYCLING OF CORONA(EROC) C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	PETER SCALAMANDRE & SONS, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	TOTAL SAFETY CONSULTING, LLC C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102
ANTHONY CORTESE SPECIALIZED HAULING LLC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	EWELL W. FINLEY, P.C., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	PINNACLE ENVIRONMENTAL CORP C/O Paul O'Brien 64-54 Maurice Avenue Maspeth, NY 11378	TUCCI EQUIPMENT RENTAL CORP Daneen Gazzola 3495 Rombouts Avenue Bronx, NY 10475
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BECHTEL ASSOCIATES PROFESSIONAL CORPORATION C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	FLEET TRUCKING, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	PRO SAFETY SERVICES, LLC Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	TURNER CONSTRUCTION COMPANY C/O London Fischer, LLP 59 Maiden Lane New York, NY 10038
BECHTEL CONSTRUCTION, INC., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	FRANCIS A. LEE COMPANY, A CORPORATION 35 Bethpage Road Hicksville, NY 11801	FTI TRUCKING C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	ULTIMATE DEMOLITIONS/CS HAULING 500 New Street Oceanside, NY 11572
BECHTEL CORPORATION C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	PT & L CONTRACTING CORP 1 Kalisa Way Ste 301		

BECHTEL ENVIRONMENTAL, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	GILSANZ MURRAY STEFICEK, LLP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	Paramus, NJ 07652	VERIZON NEW YORK, INC. C/O CT CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011
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BOVIS LEND LEASE LMB, INC. C/O Mound Cotton Wollan & Greenglass One Battery Park Plaza New York, NY 10004	HP ENVIRONMENTAL C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	ROYAL GM INC., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102
BREEZE CARTING CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	KOCH SKANSKA INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	SAB TRUCKING INC. C/O SAVERIO ANASTASIO 7 Pironi Court Woodbury, NY 11797	WHITNEY CONTRACTING INC. C/O Joanne Pisano, P.C. 1250 Central Park Avenue Yonkers, NY 10704
BREEZE NATIONAL, INC., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	LAQUILA CONSTRUCTION INC C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	SAFEWAY ENVIRONMENTAL CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	WOLKOW-BRAKER ROOFING CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102
BRER-FOUR TRANSPORTATION CORP. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	LASTRADA GENERAL CONTRACTING CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	SEASONS INDUSTRIAL CONTRACTING, 266 GREEN VALLEY RD STATEN ISLAND, NY 10312	WORLD TRADE CENTER PROPERTIES LLC C/O Edward Tanenhouse, Esq. 7 World Trade Center 38th Floor New York, NY 10048
BURO HAPPOLD CONSULTING ENGINEERS, P.C., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEER P.C. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	SEMCOR EQUIPMENT & MANUFACTURING CORP. 18 Madison Street Keyport, NJ 07735	WSP CANTOR SEINUK GROUP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102
C.B. CONTRACTING CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	LIBERTY MUTUAL GROUP C/O CT CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011	SILVERITE CONTRACTING CORPORATION C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	YANNUZZI & SONS INC 56 Oakwood Avenue Orange, NJ 07050
CANRON CONSTRUCTION CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	LOCKWOOD KESSLER & BARTLETT, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	SIMPSON GUMPERTZ & HEGER INC C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	YONKERS CONTRACTING COMPANY, INC., C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102
CORD CONTRACTING CO., INC C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	LUCIUS PITKIN, INC C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	SKIDMORE OWINGS & MERRILL LLP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	YORK HUNTER CONSTRUCTION, LLC 107 Old Goshen Road South Seaville, NJ 08246
D'ONOFRIO GENERAL CONTRACTORS CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	LZA TECH-DIV OF THORTON TOMASETTI C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	SURVIAIR 3001 S SUSAN ST SANTA ANA, CA 92704	ZIGENFUSS DRILLING, INC., C/O CT CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011
DAKOTA DEMO-TECH 140 Old Northport Road Kings Park, NY 11754	MANAFORT BROTHERS, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	MAZZOCCHI WRECKING, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	
DIAMOND POINT EXCAVATING CORP C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor Newark, NJ 07102	HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A		
DIEGO CONSTRUCTION, INC. C/O Patton Boggs, LLP 1 Riverfront Plaza, 6 th Floor			

Newark, NJ 07102

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OFF-SITE:

110 CHURCH LLC
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233 Broadway Owners, LLC
C/O Herrick Feinstein LLP
2 PARK AVENUE
NEW YORK, NY 10016

50 TRINITY, LLC
254 KATONAH AVE
STE 203
KATONAH, NY 10536

53 PARK PLACE LLC
354 5TH AVE
NEW YORK, NY 10018

88 GREENWICH LLC
139 Fifth Avenue
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C/O CT CORPORATION SYSTEM
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C T Corporation System
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BOSTON PROPERTIES, INC.
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BROADWAY WEST STREET ASSOCIATES LIMITED PARTNERSHIP
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c/o United Corporate Services, Inc.
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WHITE PLAINS, NY 10606

BROOKFIELD FINANCIAL PROPERTIES, LP
C/O United Corporate Services, Inc.
10 Bank Street, Suite 560
White Plains, NY 10606

BROOKFIELD PARTNERS, LP
C/O C T Corporation Sysytem
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BT Private Clients Corp.
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NEW YORK, NY 10005

DEUTSCHE BANK TRUST COMPANY
60 Wall Street
New York, NY 10005-2858

DEUTSCHE BANK TRUST CORPORATION
60 WALL ST
NEW YORK, NY 10005

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Stoneham, MA 02180

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C/O Timothy T McCaffrey
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Stramford, CT 06901

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31 TRESCOTT PATH
FORT SALONGA, NY 11768

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1600 Route 22 East
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INDOOR ENVIRONMENTAL TECHNOLOGY, INC.
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LIONSHEAD 110 DEVELOPMENT LLC
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39TH FLR
NEW YORK, NY 10155

LIONSHED DEVELOPMENT LLC
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MERRILL LYNCH & CO, INC.
4 WORLD FINANCIAL CTR
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Rockville, MD 20850

NEW LIBERTY PLAZA LP
ONE LIBERTY PLAZA
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NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY
110 William Street
New York, NY 10038

NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION
110 William Street
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NOMURA HOLDING AMERICA, INC.
2 World Financial Ctr. Bldg. B
New York, NY 10281-1198

NOMURA SECURITIES INTERNATIONAL, INC.
111 8th Avenue
13th Floor
New York, NY 10011

ONE LIBERTY PLAZA
165 Broadway
New York, NY 10006

STEEPLECHASE ACQUISITIONS LLC
150 EAST 58TH ST
39TH FLR
NEW YORK, NY 10155

STRUCTURE TONE (UK), INC.
770 BROADWAY
9TH FLOOR
NEW YORK, NY 10003

STRUCTURE TONE GLOBAL SERVICES, INC.
770 BROADWAY
9TH FLOOR
NEW YORK, NY 10003

THE BANK OF NEW YORK TRUST COMPANY NA
One Wall Street
New York, NY 10286

THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178)
One Liberty Plaza
165 Broadway
New York, NY 10006

THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178)
One Liberty Plaza
165 Broadway
New York, NY 10006

Tishman Interiors Corporation
666 5th Avenue
New York, NY 10103

TISHMAN SPEYER PROPERTIES
666 5th Avenue, 12th Floor
NEW YORK, NY 10103

Toscorp Inc.

120 East 40th Street
New York, NY 10016

TUCKER ANTHONY, INC.
1 World Financial Center
New York, NY 10281

Tully Construction Co., Inc.
127-50 Northern Boulevard
Flushing, NY 11368

Tully Industries, Inc.
127-50 Northern Boulevard
Flushing, NY 11368

V Cuciniello
45 Rockefeller Plaza
New York, NY 10111

VERIZON NEW YORK, INC.
1095 AVENUE OF THE AMERICAS
NEW YORK, NY 10001

WESTON SOLUTIONS, INC.
1400 Weston Way
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WFP ONE LIBERTY PLAZA CO., L.P.
80 STATE STREET
ALBANY, NY 12207

WFP ONE LIBERTY PLAZA, CO. GP, CORP.
3 WORLD FINANCIAL CENTER
NEW YORK, NY 10281

WFP TOWER A CO. G.P. CORP.
United Corporate Services, Inc.
10 Bank Street
White Plains, NY 10606

WFP TOWER A CO.
200 Liberty Street
New York, NY 10218

WFP TOWER A. CO., L.P.
10 BANK STREET
STE 560
WHITE PLAINS, NY 10606

WFP TOWER B CO. G.P. CORP.
United Corporate Services, Inc.
10 Bank Street
White Plains, NY 10606

WFP TOWER B HOLDING CO., LP
United Corporate Services, Inc.
10 Bank Street
White Plains, NY 10606

WFP TOWER B. CO., L.P.
10 BANK STREET
STE 560
WHITE PLAINS, NY 10606

WFP TOWER D CO. G.P. CORP.
C/O Brookfield Financial Properties LP
One Liberty Plaza
New York, NY 10006

WFP TOWER D HOLDING CO. I L.P.
c/o Corporation Service Company
80 STATE STREET
Albany, NY 12207-2543

WFP TOWER D HOLDING CO. II L.P.
C/O CORPORATION SERVICE COMPANY
80 STATE STREET
Albany, NY 12207-2543

WFP TOWER D HOLDING I G.P. CORP.
C/O Brookfield Financial Properties LP
One Liberty Plaza
New York, NY 10006

WFP TOWER D. CO., L.P.
222 Broadway
New York, NY 10006

WORLD FINANCIAL PROPERTIES, L.P.
80 STATE STREET
ALBANY, NY 12207

08 CV 01015

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION (straddler plaintiffs)**

DALIA NAUTA AND LUIS NAUTO

Plaintiffs,

- against -

(SEE SECTION I. B: DEFENDANTS)

Defendants.

21 MC 103 (AKH)

DOCKET NO.

JAN 31 2008

**CHECK-OFF ("SHORT FORM")
COMPLAINT
RELATED TO THE
MASTER COMPLAINTS**

**PLAINTIFF(S) DEMAND A TRIAL BY
JURY**

By Case Management Order Number 1, of the Honorable Alvin K. Hellerstein, United States District Judge, dated March 28, 2007, ("the Order"), Plaintiff(s) file this "straddler" check-off complaint and incorporates herein the master complaints in 21 MC 100 and 21 MC 102.

NOTICE OF ADOPTION

All headings and paragraphs in the Master Complaints in 21 MC 100 and 21 MC 102 are applicable to and are adopted by the instant Plaintiff(s) as if fully set forth herein in addition to those paragraphs specific to the individual Plaintiff(s), which are listed below. These are marked with an "☒" if applicable to the instant Plaintiff(s), and specific case information is set forth, as needed, below.

Plaintiff(s), DALIA NAUTA AND LUIS NAUTO, by his/her/their attorneys WORBY GRONER EDELMAN & NAPOLI BERN, LLP, complaining of Defendant(s), respectfully allege:

I. PARTIES

A. PLAINTIFF(S)

1. Plaintiff, DALIA NAUTA (hereinafter the "Injured Plaintiff"), is an individual and a citizen of New York residing at 40-35 67th Street, Apt. 26, Woodside, NY 11377.

(OR)

2. Alternatively, _____ is the _____ of Decedent _____, and brings this claim in his (her) capacity as _____ of the Estate of _____.

3. Plaintiff, Luis Nauto (hereinafter the "Derivative Plaintiff), is a citizen of New York residing at 40-35 67th Street, Apt. 26, Woodside, NY 11377, and has the following relationship to the Injured Plaintiff:

SPOUSE at all relevant times herein, is and has been lawfully married to Plaintiff DALIA NAUTA, and brings this derivative action for her (his) loss due to the injuries sustained by her husband (his wife), Plaintiff DALIA NAUTA.

Parent Child Other: _____

4. In the period from to the Injured Plaintiff worked for Affiliated Environmental Services, Comprehensive Environmental, ETS Contracting, Inc., PAL Environmental Safety, Pinnacle Environmental Corp., and Slavco Construction, Inc as a at:

Please be as specific as possible when filling in the following dates and locations

The World Trade Center Site

Location(s) (i.e., building, quadrant, etc.) _____

From on or about _____ until _____;

Approximately _____ hours per day; for

Approximately _____ days total.

The New York City Medical Examiner's Office

From on or about _____ until _____,

Approximately _____ hours per day; for

Approximately _____ days total.

The Fresh Kills Landfill

From on or about _____ until _____;

Approximately _____ hours per day; for

Approximately _____ days total.

The Barge

From on or about _____ until _____;

Approximately _____ hours per day; for

Approximately _____ days total.

Other: See Chart Below

Instructions: To the extent that plaintiff has specificity as to the area within the building/location listed, such should be indicated on a separate line. If plaintiff is unable at this time to enunciate such specificity at this time, the applicable column should be marked with an "☒." (See Sample Chart below)

Each sub-paragraph shall be deemed to allege: "The Injured Plaintiff at times relevant to the claims herein, worked at (address/location) for the following (dates of employment), while in the employ of (name of employer), maintaining the position of (job title) and worked at said

*Please read this document carefully.
It is very important that you fill out each and every section of this document.*

location for approximately (hours).i.e. The Injured Plaintiff at times relevant to the claims herein, worked at 500 Broadway, for the following dates, 10/1/01-6/1/02, while in the employ of ABC Corp, maintaining the position of cleaner and worked at said location for approximately 20 hours.

- The Injured Plaintiff worked off-site at the address/location for following dates of employment, for the employer, in the job title of, and for the number of hours, as specified below.

It is very important that you fill out each and every section of this document.

Sample Chart

ADDRESS/ LOCATION	FLOOR(S)/ AREAS	DATES OF EMPLOYMENT	NAME OF EMPLOYER	JOB TITLE	JOB ACTIVITY	HOURS WORKED	SHIFT WORKED	Percent Of Total Hours
<input checked="" type="checkbox"/> 31a *500 Broadway	2	10/1/01-6/1/02	ABC CORP.	CLEANER	DEMOLITION/DEBRIS REMOVAL	20	8AM-5PM	50
<input checked="" type="checkbox"/> 31b 1600 Broadway	2	11/1/01-11/15/01	ABC CORP.	CLEANER	X	10	X	25
<input checked="" type="checkbox"/> 31c 1600 Broadway	basement	12/15/01- 12/16/01	XYZ Corp.	CLEANER	X	10	X	25
Total Hours Worked Off-Site:								40

ADDRESS/LOCATION	Floor(s)/ Areas	DATES OF EMPLOYMENT	NAME OF EMPLOYER	JOB TITLE	Job Activity	HOURS WORKED	Shift Worked	Percent Of Total
31a. 1 World Financial Center	To Be Supplied for all Sites Listed	11/06/2001-07/15/2002	Affiliated Environmental Services, Comprehensive Environmental, ETS Contracting, Inc., PAL Environmental Safety,	To Be Provided	To Be Provided	187	To Be Supplied for all Sites Listed	9.9%
31b. 1-9 RECTOR STREET	-	01/21/2002-01/28/2002	-	-	-	19	-	1.0%
31c. 2 World Financial Center	-	02/04/2001-03/11/2002	Same As Above	Same As Above	-	150	-	8.0%
31d. 233 Broadway	-	03/31/2003-04/06/2003	Same As Above	Same As Above	-	8	-	0.4%
31e. 30 Rockefeller Plaza	-	09/28/2004-05/14/2007	Same As Above	Same As Above	-	142	-	7.5%
31f. 4 World Financial Center	-	02/12/2002-03/11/2002	Same As Above	Same As Above	-	102	-	5.4%
31g. Bank of New York	-	12/11/2001-12/17/2001	Same As Above	Same As Above	-	6	-	0.3%
31h. Deutsche Bank Building	-	10/16/2002-11/25/2002	Same As Above	Same As Above	-	132	-	7.0%
31i. One Liberty Plaza	-	01/08/2002-01/14/2002	Same As Above	Same As Above	-	11	-	0.6%
31j. Post Office	-	10/24/2001-07/14/2003	Same As Above	Same As Above	-	717	-	38.0%
31k. Verizon Building	-	09/12/2001-10/24/2001	Same As Above	Same As Above	-	412	-	21.8%
31l.	-	-	Same As Above	Same As Above	-	-	-	-
31m.	-	-	Same As Above	Same As Above	-	-	-	-
31n.	-	-	-	-	-	-	-	-
31o.	-	-	-	-	-	-	-	-
31p.	-	-	-	-	-	-	-	-
31q.	-	-	-	-	-	-	-	-
31r.	-	-	-	-	-	-	-	-
31s.	-	-	-	-	-	-	-	-

Other (if checked, attach Rider and continue with same format for sub-divisions)

The plaintiff worked for the total number of hours as indicated below:



Total Hours Worked Off-Site: 1886

*Continue this information on a separate sheet of paper if necessary. If more space is needed to specify "Other" locations, please annex a separate sheet of paper with the information.

5. Injured Plaintiff

- Was exposed to and breathed noxious fumes on all dates, at the site(s) indicated above;
- Was exposed to and inhaled or ingested toxic substances and particulates on all dates at the site(s) indicated above;
- Was exposed to and absorbed or touched toxic or caustic substances on all dates at the site(s) indicated above;
- Other: Not yet determined.

6. Injured Plaintiff

- Has not made a claim to the Victim Compensation Fund. Pursuant to §405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- Made a claim to the Victim Compensation Fund that was denied. Pursuant to § 405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- Made a claim to the Victim Compensation Fund, that was subsequently withdrawn by Ground-Zero Plaintiff. Pursuant to § 405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- Made a claim to the Victim Compensation Fund that was granted. Pursuant to § 405(c)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, Ground Zero-Plaintiff has waived her/his right(s) to pursue any further legal action for the injuries identified in said claim.

B. DEFENDANT(S)

The following is a list of all Defendant(s) named in the Master Complaints. If checked, all paragraphs pertaining to that Defendant are deemed pleaded herein.

<p><input type="checkbox"/> THE CITY OF NEW YORK</p> <p><input type="checkbox"/> A Notice of Claim was timely filed and served on _____ and pursuant to General Municipal Law §50-h the CITY held a hearing on _____ (OR)</p> <p><input type="checkbox"/> The City has yet to hold a hearing as required by General Municipal Law §50-h</p> <p><input type="checkbox"/> More than thirty days have passed and the City has not adjusted the claim (OR)</p> <p><input type="checkbox"/> An Order to Show Cause application to deem Plaintiff's (Plaintiffs') Notice of Claim timely filed, or in the alternative to grant Plaintiff(s) leave to file a late Notice of Claim <i>Nunc Pro Tunc</i> (for leave to file a late Notice of Claim <i>Nunc Pro Tunc</i>) has been filed and a determination</p> <p><input type="checkbox"/> is pending</p> <p><input type="checkbox"/> Granting petition was made on _____</p> <p><input type="checkbox"/> Denying petition was made on _____</p> <hr/> <p><input type="checkbox"/> PORT AUTHORITY OF NEW YORK AND NEW JERSEY ["PORT AUTHORITY"]</p> <p><input type="checkbox"/> A Notice of Claim was filed and served pursuant to Chapter 179, §7 of The Unconsolidated Laws of the State of New York on</p> <p><input type="checkbox"/> More than sixty days have elapsed since the Notice of Claim was filed, (and)</p> <p><input type="checkbox"/> the PORT AUTHORITY has adjusted this claim</p> <p><input type="checkbox"/> the PORT AUTHORITY has not adjusted this claim.</p> <hr/> <p><input type="checkbox"/> 1 WORLD TRADE CENTER, LLC</p> <p><input type="checkbox"/> 1 WTC HOLDINGS, LLC</p> <p><input type="checkbox"/> 2 WORLD TRADE CENTER, LLC</p> <p><input type="checkbox"/> 2 WTC HOLDINGS, LLC</p> <p><input type="checkbox"/> 4 WORLD TRADE CENTER, LLC</p> <p><input type="checkbox"/> 4 WTC HOLDINGS, LLC</p> <p><input type="checkbox"/> 5 WORLD TRADE CENTER, LLC</p> <p><input type="checkbox"/> 5 WTC HOLDINGS, LLC</p> <p><input type="checkbox"/> 7 WORLD TRADE COMPANY, L.P.</p> <p><input checked="" type="checkbox"/> A RUSSO WRECKING</p>	<p><input checked="" type="checkbox"/> ABM INDUSTRIES, INC.</p> <p><input checked="" type="checkbox"/> ABM JANITORIAL NORTHEAST, INC.</p> <p><input checked="" type="checkbox"/> AMEC CONSTRUCTION MANAGEMENT, INC.</p> <p><input checked="" type="checkbox"/> AMEC EARTH & ENVIRONMENTAL, INC.</p> <p><input checked="" type="checkbox"/> ANTHONY CORTESE SPECIALIZED HAULING, LLC, INC.</p> <p><input checked="" type="checkbox"/> ATLANTIC HEYDT CORP</p> <p><input checked="" type="checkbox"/> BECHTEL ASSOCIATES PROFESSIONAL CORPORATION</p> <p><input checked="" type="checkbox"/> BECHTEL CONSTRUCTION, INC.</p> <p><input checked="" type="checkbox"/> BECHTEL CORPORATION</p> <p><input checked="" type="checkbox"/> BECHTEL ENVIRONMENTAL, INC.</p> <p><input checked="" type="checkbox"/> BERKEL & COMPANY, CONTRACTORS, INC.</p> <p><input checked="" type="checkbox"/> BIG APPLE WRECKING & CONSTRUCTION CORP</p> <p><input type="checkbox"/> BOVIS LEND LEASE, INC.</p> <p><input checked="" type="checkbox"/> BOVIS LEND LEASE LMB, INC.</p> <p><input checked="" type="checkbox"/> BREEZE CARTING CORP</p> <p><input checked="" type="checkbox"/> BREEZE NATIONAL, INC.</p> <p><input checked="" type="checkbox"/> BRER-FOUR TRANSPORTATION CORP.</p> <p><input checked="" type="checkbox"/> BURO HAPOLD CONSULTING ENGINEERS, P.C.</p> <p><input checked="" type="checkbox"/> C.B. CONTRACTING CORP</p> <p><input checked="" type="checkbox"/> CANRON CONSTRUCTION CORP</p> <p><input type="checkbox"/> CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.</p> <p><input checked="" type="checkbox"/> CORD CONTRACTING CO., INC</p> <p><input type="checkbox"/> CRAIG TEST BORING COMPANY INC.</p> <p><input checked="" type="checkbox"/> DAKOTA DEMO-TECH</p> <p><input checked="" type="checkbox"/> DIAMOND POINT EXCAVATING CORP</p> <p><input checked="" type="checkbox"/> DIEGO CONSTRUCTION, INC.</p> <p><input checked="" type="checkbox"/> DIVERSIFIED CARTING, INC.</p> <p><input checked="" type="checkbox"/> DMT ENTERPRISE, INC.</p> <p><input checked="" type="checkbox"/> D'ONOFRIO GENERAL CONTRACTORS CORP</p> <p><input checked="" type="checkbox"/> EAGLE LEASING & INDUSTRIAL SUPPLY</p> <p><input checked="" type="checkbox"/> EAGLE ONE ROOFING CONTRACTORS INC.</p> <p><input type="checkbox"/> EAGLE SCAFFOLDING CO, INC.</p> <p><input checked="" type="checkbox"/> EJ DAVIES, INC.</p> <p><input checked="" type="checkbox"/> EN-TECH CORP</p> <p><input type="checkbox"/> ET ENVIRONMENTAL</p> <p><input type="checkbox"/> EVANS ENVIRONMENTAL</p> <p><input checked="" type="checkbox"/> EVERGREEN RECYCLING OF CORONA</p> <p><input checked="" type="checkbox"/> EWELL W. FINLEY, P.C.</p>
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EXECUTIVE MEDICAL SERVICES, P.C.
 F&G MECHANICAL, INC.
 FLEET TRUCKING, INC.
 FRANCIS A. LEE COMPANY, A CORPORATION
 FTI TRUCKING
 GILSANZ MURRAY STEFICEK, LLP
 GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC
 HALLEN WELDING SERVICE, INC.
 H.P. ENVIRONMENTAL
 HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.
 KOCH SKANSKA INC.
 LAQUILA CONSTRUCTION INC
 LASTRADA GENERAL CONTRACTING CORP
 LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEER P.C.
 LIBERTY MUTUAL GROUP
 LOCKWOOD KESSLER & BARTLETT, INC.
 LUCIUS PITKIN, INC
 LZA TECH-DIV OF THORTON TOMASETTI
 MANAFORT BROTHERS, INC.
 MAZZOCCHI WRECKING, INC.
 MORETRENCH AMERICAN CORP.
 MRA ENGINEERING P.C.
 MUESER RUTLEDGE CONSULTING ENGINEERS
 NACIREMA INDUSTRIES INCORPORATED
 NEW YORK CRANE & EQUIPMENT CORP.
 NICHOLSON CONSTRUCTION COMPANY
 PETER SCALAMANDRE & SONS, INC.
 PHILLIPS AND JORDAN, INC.
 PINNACLE ENVIRONMENTAL CORP
 PLAZA CONSTRUCTION CORP.
 PRO SAFETY SERVICES, LLC
 PT & L CONTRACTING CORP
 REGIONAL SCAFFOLD & HOISTING CO, INC.
 ROBER SILMAN ASSOCIATES
 ROBERT L GEROSA, INC
 RODAR ENTERPRISES, INC.
 ROYAL GM INC.
 SAB TRUCKING INC.
 SAFEWAY ENVIRONMENTAL CORP
 SEASONS INDUSTRIAL CONTRACTING
 SEMCOR EQUIPMENT & MANUFACTURING CORP.
 SILVERITE CONTRACTING CORPORATION
 SILVERSTEIN PROPERTIES

SILVERSTEIN PROPERTIES, INC.
 SILVERSTEIN WTC FACILITY MANAGER, LLC
 SILVERSTEIN WTC, LLC
 SILVERSTEIN WTC MANAGEMENT CO., LLC
 SILVERSTEIN WTC PROPERTIES, LLC
 SILVERSTEIN DEVELOPMENT CORP.
 SILVERSTEIN WTC PROPERTIES LLC
 SIMPSON GUMPERTZ & HEGER INC
 SKIDMORE OWINGS & MERRILL LLP
 SURVIAIR
 TAYLOR RECYCLING FACILITY LLC
 TISHMAN INTERIORS CORPORATION,
 TISHMAN SPEYER PROPERTIES,
 TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN
 TISHMAN CONSTRUCTION CORPORATION OF NEW YORK
 THORNTON-TOMASETTI GROUP, INC.
 TORRETTA TRUCKING, INC
 TOTAL SAFETY CONSULTING, L.L.C
 TUCCI EQUIPMENT RENTAL CORP
 TULLY CONSTRUCTION CO., INC.
 TULLY ENVIRONMENTAL INC.
 TULLY INDUSTRIES, INC.
 TURNER CONSTRUCTION CO.
 TURNER CONSTRUCTION COMPANY
 ULTIMATE DEMOLITIONS/CS HAULING
 VERIZON NEW YORK INC,
 VOLLMER ASSOCIATES LLP
 W HARRIS & SONS INC
 WEEKS MARINE, INC.
 WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.
 WHITNEY CONTRACTING INC.
 WOLKOW-BRAKER ROOFING CORP
 WORLD TRADE CENTER PROPERTIES, LLC
 WSP CANTOR SEINUKE GROUP
 YANNUZZI & SONS INC
 YONKERS CONTRACTING COMPANY, INC.
 YORK HUNTER CONSTRUCTION, LLC
 ZIEGENFUSS DRILLING, INC.
 OTHER: _____

The specific Defendants alleged relationship to the property, as indicated below or as otherwise the evidence may disclose, or their role with relationship to the work thereat, gives rise to liability under the causes of actions alleged, as referenced in the Master Complaint in 21 MC 102.

Instruction: The Defendant(s) names in the 21 MC 102 Master Complaint are re-stated below. The Defendant's are listed by reference to the building and/or location at which this specific plaintiff alleges to have worked. . Each sub- paragraph shall be deemed to allege: "With reference to (address), the defendant (entity) was a and/or the (relationship) of and/or at the subject property and/or in such relationship as the evidence may disclose," (i.e. With reference to 4 Albany Street, defendant Bankers Trust Company, was the owner of the subject project and/or in such relationship as the evidence may disclose)

1. With reference to (address as checked below), the defendant (entity as checked below) was a and/or the (relationship as indicated below) of and/or at the subject property and/or in such relationship as the evidence may disclose.

<input checked="" type="checkbox"/> (1-20) 233 BROADWAY <ul style="list-style-type: none"> <input checked="" type="checkbox"/> A. 233 BROADWAY OWNERS, LLC (OWNER) 	<input checked="" type="checkbox"/> D. LIONSHEAD DEVELOPMENT LLC (OWNER/AGENT) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> E. LIONSHEAD 110 DEVELOPMENT LLC (OWNER/AGENT)
<input checked="" type="checkbox"/> (1-26) 90 CHURCH STREET (POST OFFICE) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> A. 90 CHURCH STREET LIMITED PARTNERSHIP (OWNER) <input checked="" type="checkbox"/> B. BOSTON PROPERTIES, INC. (OWNER) <input checked="" type="checkbox"/> C. STUCTURE TONE (UK), INC. (CONTRACTOR) <input checked="" type="checkbox"/> D. STRUCTURE TONE GLOBAL SERVICES, INC. (CONTRACTOR) <input checked="" type="checkbox"/> E. BELFOR USA GROUP, INC. (CONTRACTOR) <input checked="" type="checkbox"/> F. AMBIENT GROUP, INC. (CONTRACTOR) 	<input checked="" type="checkbox"/> (1-45) ONE LIBERTY PLAZA <ul style="list-style-type: none"> <input checked="" type="checkbox"/> A. NEW LIBERTY PLAZA LP (OWNER) <input checked="" type="checkbox"/> B. WORLD FINANCIAL PROPERTIES, L.P. (OWNER) <input checked="" type="checkbox"/> C. WFP ONE LIBERTY PLAZA CO., L.P. (OWNER) <input checked="" type="checkbox"/> D. ONE LIBERTY PLAZA (OWNER) <input checked="" type="checkbox"/> E. BROOKFIELD FINANCIAL PROPERTIES, INC. (OWNER) <input checked="" type="checkbox"/> F. WFP ONE LIBERTY PLAZA, CO. GP, CORP. (OWNER) <input checked="" type="checkbox"/> G. THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178) (OWNER)
<input checked="" type="checkbox"/> (1-30) 120 CHURCH STREET (BANK OF NEW YORK) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> A. 110 CHURCH LLC (OWNER) <input checked="" type="checkbox"/> B. 53 PARK PLACE LLC (OWNER) <input checked="" type="checkbox"/> C. ZAR REALTY MANAGEMENT CORP. (AGENT) 	

<p><input checked="" type="checkbox"/> H. THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178) (OWNER)</p> <p><input checked="" type="checkbox"/> I. BFP ONE LIBERTY PLAZA CO., LLC (OWNER)</p> <p><input checked="" type="checkbox"/> J. NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC. (OWNER)</p> <p><input checked="" type="checkbox"/> K. NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY (OWNER)</p> <p><input checked="" type="checkbox"/> L. NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION (OWNER)</p> <p><input checked="" type="checkbox"/> M. BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. d/b/a BMS CAT (AGENT/CONTRACTOR)</p> <p><input checked="" type="checkbox"/> N. HILLMAN ENVIRONMENTAL GROUP, LLC. (AGENT/CONTRACTOR)</p> <p><input checked="" type="checkbox"/> O. GENERAL RE SERVICES CORP. (OWNER/AGENT)</p> <p><input checked="" type="checkbox"/> (1-47) 130 LIBERTY STREET (DEUTSCHE BANK BUILDING)</p> <p><input checked="" type="checkbox"/> A. DEUTSCHE BANK TRUST CORPORATION (OWNER)</p> <p><input checked="" type="checkbox"/> B. DEUTSCHE BANK TRUST COMPANY (OWNER)</p> <p><input checked="" type="checkbox"/> C. BANKERS TRUST CORPORATION (OWNER)</p> <p><input checked="" type="checkbox"/> D. DEUTSCHE BANK TRUST COMPANY AMERICAS (OWNER)</p> <p><input checked="" type="checkbox"/> E. THE BANK OF NEW YORK TRUST COMPANY NA (OWNER)</p> <p><input checked="" type="checkbox"/> F. BT PRIVATE CLIENTS CORP. (OWNER)</p> <p><input checked="" type="checkbox"/> G. TISHMAN INTERIORS CORPORATION (CONTRACTOR)</p> <p><input checked="" type="checkbox"/> H. TULLY CONSTRUCTION CO., INC. (CONTRACTOR)</p> <p><input checked="" type="checkbox"/> I. TULLY INDUSTRIES (CONTRACTOR)</p> <p><input checked="" type="checkbox"/> (1-60) 1-9 RECTOR STREET</p> <p><input checked="" type="checkbox"/> A. 50 TRINITY, LLC (OWNER)</p> <p><input checked="" type="checkbox"/> B. BROADWAY WEST STREET ASSOCIATES LIMITED PARTNERSHIP (OWNER)</p> <p><input checked="" type="checkbox"/> C. HIGHLAND DEVELOPMENT LLC (OWNER)</p> <p><input checked="" type="checkbox"/> D. STEEPLECHASE ACQUISITIONS LLC (OWNER)</p> <p><input checked="" type="checkbox"/> E. BLACK DIAMONDS LLC (OWNER)</p> <p><input checked="" type="checkbox"/> F. 88 GREENWICH LLC (OWNER)</p> <p><input checked="" type="checkbox"/> (1-91) 140 WEST STREET (VERIZON BUILDING)</p> <p><input checked="" type="checkbox"/> A. VERIZON NEW YORK, INC. (OWNER)</p> <p><input checked="" type="checkbox"/> B. HILLMAN ENVIRONMENTAL GROUP, LLC. (OWNER'S AGENT/CONTRACTOR)</p> <p><input checked="" type="checkbox"/> (1-93) 200 LIBERTY STREET (ONE WORLD FINANCIAL CENTER)</p>	<p><input checked="" type="checkbox"/> A. BATTERY PARK CITY AUTHORITY (OWNER)</p> <p><input checked="" type="checkbox"/> B. BROOKFIELD PROPERTIES CORPORATION (OWNER)</p> <p><input checked="" type="checkbox"/> C. BROOKFIELD FINANCIAL PROPERTIES, LP (OWNER)</p> <p><input checked="" type="checkbox"/> D. BROOKFIELD FINANCIAL PROPERTIES, INC. (OWNER)</p> <p><input checked="" type="checkbox"/> E. BROOKFIELD PROPERTIES HOLDINGS INC. (OWNER)</p> <p><input checked="" type="checkbox"/> F. BROOKFIELD PARTNERS, LP (OWNER)</p> <p><input checked="" type="checkbox"/> G. WFP TOWER A CO. (OWNER)</p> <p><input checked="" type="checkbox"/> H. WFP TOWER A CO. L.P. (OWNER)</p> <p><input checked="" type="checkbox"/> I. WFP TOWER A. CO. G.P. CORP. (OWNER)</p> <p><input checked="" type="checkbox"/> J. TUCKER ANTHONY, INC. (AGENT)</p> <p><input checked="" type="checkbox"/> K. BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. d/b/a BMS CAT (CONTRACTOR/AGENT)</p> <p><input checked="" type="checkbox"/> (1-94) 225 LIBERTY STREET (TWO WORLD FINANCIAL CENTER)</p> <p><input checked="" type="checkbox"/> A. BATTERY PARK CITY AUTHORITY (OWNER)</p> <p><input checked="" type="checkbox"/> B. BROOKFIELD PROPERTIES CORPORATION (OWNER)</p> <p><input checked="" type="checkbox"/> C. BROOKFIELD PARTNERS, L.P. (OWNER)</p> <p><input checked="" type="checkbox"/> D. BROOKFIELD PROPERTIES HOLDINGS INC. (OWNER)</p> <p><input checked="" type="checkbox"/> E. BROOKFIELD FINANCIAL PROPERTIES, L.P. (OWNER)</p> <p><input checked="" type="checkbox"/> F. BROOKFIELD FINANCIAL PROPERTIES, INC. (OWNER)</p> <p><input checked="" type="checkbox"/> G. MERRILL LYNCH & CO, INC. (OWNER)</p> <p><input checked="" type="checkbox"/> H. WESTON SOLUTIONS, INC. (AGENT/CONTRACTOR)</p> <p><input checked="" type="checkbox"/> I. GPS ENVIRONMENTAL CONSULTANTS, INC. (AGENT/CONTRACTOR)</p> <p><input checked="" type="checkbox"/> J. INDOOR ENVIRONMENTAL TECHNOLOGY, INC. (AGENT/CONTRACTOR)</p> <p><input checked="" type="checkbox"/> K. BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. d/b/a BMS CAT (AGENT/CONTRACTOR)</p> <p><input checked="" type="checkbox"/> L. STRUCTURE TONE, (UK) INC. (CONTRACTOR)</p> <p><input checked="" type="checkbox"/> M. STRUCTURE TONE GLOBAL SERVICES, INC (CONTRACTOR)</p> <p><input checked="" type="checkbox"/> N. ENVIROTECH CLEAN AIR, INC. (CONTRACTOR)</p> <p><input checked="" type="checkbox"/> O. ALAN KASMAN DBA KASCO (CONTRACTOR)</p> <p><input checked="" type="checkbox"/> P. KASCO RESTORATION SERVICES CO. (CONTRACTOR)</p>
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<input checked="" type="checkbox"/> Q. NOMURA HOLDING AMERICA, INC. (OWNER) <input checked="" type="checkbox"/> R. NOMURA SECURITIES INTERNATIONAL, INC. (OWNER) <input checked="" type="checkbox"/> S. WFP TOWER B HOLDING CO., LP (OWNER) <input checked="" type="checkbox"/> T. WFP TOWER B CO., G.P. CORP. (OWNER) <input checked="" type="checkbox"/> U. WFP TOWER B CO. L.P. (OWNER) <input checked="" type="checkbox"/> V. TOSCORP. INC. (OWNER) <input checked="" type="checkbox"/> W. HILLMAN ENVIRONMENTAL GROUP, LLC. (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> X. ANN TAYLOR STORES CORPORATION (OWNER) <input checked="" type="checkbox"/> (1-96) 250 VESEY STREET (FOUR WORLD FINANCIAL CENTER) <input checked="" type="checkbox"/> A. BATTERY PARK CITY AUTHORITY (OWNER) <input checked="" type="checkbox"/> B. BROOKFIELD PROPERTIES CORPORATION (OWNER) <input checked="" type="checkbox"/> C. BROOKFIELD FINANCIAL PROPERTIES, LP. (OWNER) <input checked="" type="checkbox"/> D. BROOKFIELD FINANCIAL PROPERTIES, INC. (OWNER) <input checked="" type="checkbox"/> E. BROOKFIELD PROPERTIES HOLDINGS, INC. (OWNER) <input checked="" type="checkbox"/> F. BROOKFIELD PARTNERS, LP (OWNER) <input checked="" type="checkbox"/> G. WFP TOWER D CO. L.P. (OWNER) <input checked="" type="checkbox"/> H. WFP TOWER D CO., G.P. CORP. (OWNER) <input checked="" type="checkbox"/> I. WFP TOWER D HOLDING I G.P. CORP. (OWNER)	<input checked="" type="checkbox"/> J. WFP TOWER D HOLDING CO. I L.P. (OWNER) <input checked="" type="checkbox"/> K. WFP TOWER D HOLDING CO. II L.P. (OWNER) <input checked="" type="checkbox"/> L. MERRILL LYNCH & CO, INC. (OWNER) <input checked="" type="checkbox"/> M. WESTON SOLUTIONS, INC. (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> N. GPS ENVIRONMENTAL CONSULTANTS, INC. (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> O. INDOOR ENVIRONMENTAL TECHNOLOGY, INC. (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> P. BLACKMON-MOORING-STEAMATIC CATASTROPHE, NC. d/b/a BMS CAT (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> Q. STRUCTURE TONE, (UK) INC. (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> R. STRUCTURE TONE GLOBAL SERVICES, INC (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> S. ENVIROTECH CLEAN AIR, INC. (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> T. ALAN KASMAN DBA KASCO (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> U. KASCO RESTORATION SERVICES CO. (AGENT/CONTRACTOR) <input checked="" type="checkbox"/> (1-117) 30 VESEY STREET <input checked="" type="checkbox"/> A. SILVERSTEIN PROPERTIES (OWNER)
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OTHER: if an individual plaintiff is alleging injury sustained at a building/location other than as above, and/or if an individual plaintiff is alleging an injury sustained at a building/location above, but is alleging a claim against a defendant not listed for said building, plaintiff should check this box, and attach a Rider. Individual plaintiff should then immediately notify Plaintiff Liaison by email and in writing, and request an amendment to the Master Pleadings and the Check-Off Complaint pursuant to the applicable CMO governing said amendment.

II. JURISDICTION

The Court's jurisdiction over the subject matter of this action is:

Founded upon Federal Question Jurisdiction; specifically; Air Transport Safety & System Stabilization Act of 2001, (or); Federal Officers Jurisdiction, (or); Other (specify): _____; Contested, but the Court has already determined that it has removal jurisdiction over this action, pursuant to 28 U.S.C. § 1441.

III CAUSES OF ACTION

Plaintiff(s) seeks damages against the above named defendants based upon the following theories of liability, and asserts each element necessary to establish such a claim under the applicable substantive law:

<input checked="" type="checkbox"/>	Breach of the defendants' duties and obligations pursuant to the New York State Labor Law(s) including §§ 200 and 240	<input checked="" type="checkbox"/>	Common Law Negligence, including allegations of Fraud and Misrepresentation
<input checked="" type="checkbox"/>	Breach of the defendants' duties and obligations pursuant to the New York State Labor Law 241(6)	<input checked="" type="checkbox"/> Air Quality; <input checked="" type="checkbox"/> Effectiveness of Mask Provided; <input type="checkbox"/> Effectiveness of Other Safety Equipment Provided	
<input type="checkbox"/>	Pursuant to New York General Municipal Law §205-a		(specify: _____); <input checked="" type="checkbox"/> Other(specify): <u>Not yet determined.</u>
<input type="checkbox"/>	Pursuant to New York General Municipal Law §205-e	<input type="checkbox"/>	Wrongful Death
		<input checked="" type="checkbox"/>	Loss of Services/Loss of Consortium for Derivative Plaintiff
		<input type="checkbox"/>	Other: _____

IV CAUSATION, INJURY AND DAMAGE

1. As a direct and proximate result of defendant's culpable actions in the rescue and/or recovery and/or construction, renovation, alteration, demolition and all work performed at the premises, the Injured Plaintiff sustained (including, but not limited to) the following injuries:

<input type="checkbox"/> Cancer Injury: <u>N/A.</u> Date of onset: _____ Date physician first connected this injury to WTC work: _____	<input type="checkbox"/> Cardiovascular Injury: <u>N/A.</u> Date of onset: _____ Date physician first connected this injury to WTC work: _____
<input checked="" type="checkbox"/> Respiratory Injury: <u>Respiratory Problems</u> Date of onset: <u>2/1/2005</u> Date physician first connected this injury to WTC work: <u>To be supplied at a later date</u>	<input checked="" type="checkbox"/> Fear of Cancer Date of onset: <u>2/1/2005</u> Date physician first connected this injury to WTC work: <u>To be supplied at a later date</u>
<input type="checkbox"/> Digestive Injury: <u>N/A.</u> Date of onset: _____ Date physician first connected this injury to WTC work: _____	<input checked="" type="checkbox"/> Other Injury: <u>N/A.</u> Date of onset: _____ Date physician first connected this injury to WTC work: _____

NOTE: The foregoing is NOT an exhaustive list of injuries that may be alleged.

2. As a direct and proximate result of the injuries identified in paragraph "1", above, the Ground Zero-Plaintiff has in the past suffered and/or will in the future suffer the following compensable damages:

<input checked="" type="checkbox"/> Pain and suffering <input checked="" type="checkbox"/> Loss of the enjoyment of life <input checked="" type="checkbox"/> Loss of earnings and/or impairment of earning capacity <input checked="" type="checkbox"/> Loss of retirement benefits/diminution of retirement benefits	<input checked="" type="checkbox"/> Expenses for medical care, treatment, and rehabilitation <input checked="" type="checkbox"/> Other: <input checked="" type="checkbox"/> Mental anguish <input checked="" type="checkbox"/> Disability <input checked="" type="checkbox"/> Medical monitoring <input checked="" type="checkbox"/> Other: <u>Not yet determined.</u>
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3. As a direct and proximate result of the injuries described *supra*, the derivative plaintiff(s), if any, have in the past suffered and/or will in the future suffer a loss of the love, society, companionship, services, affection, and support of the plaintiff and such other losses, injuries and damages for which compensation is legally appropriate.

WHEREFORE, plaintiff(s) respectfully pray that the Court enter judgment in his/her/their favor and against defendant(s) for damages, costs of suit and such other, further and different relief as may be just and appropriate.

Plaintiff(s) demands that all issues of fact in this case be tried before a properly empanelled jury.

Dated: New York, New York
January 30, 2008

Yours, etc.,

Worby, Groner Edelman & Napoli Bern, LLP
Attorneys for Plaintiff(s), Dalia Nauta and Luis Nauto

By:



Christopher R. LoPalo (CL 6466)
115 Broadway
12th Floor
New York, New York 10006
Phone: (212) 267-3700

ATTORNEY VERIFICATION

CHRISTOPHER R. LOPALO, an attorney at law, duly admitted to practice in the Courts of the State of New York, affirms under the penalties of perjury that:

He is the attorney for the plaintiff(s) in the above-entitled action. That he has read the foregoing SUMMONS AND VERIFIED COMPLAINT and knows the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.

The reason this Verification is made by deponent and not by the plaintiff(s) is that the plaintiff(s) herein reside(s) in a county other than the one in which the plaintiff's attorneys maintain their office.

The source of deponent's information and the grounds of his belief are communication, papers, reports and investigation contained in the file.

DATED: New York, New York
 January 30, 2008



CHRISTOPHER R. LOPALO

Docket No:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

=====

Dalia Nauta (and Husband, Luis Nauto),

Plaintiff(s)
- against -

SEE RIDER

Defendant(s).

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SUMMONS AND VERIFIED COMPLAINT

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WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Attorneys for: Plaintiff(s)
Office and Post Office Address, Telephone
115 Broadway - 12th Floor
New York, New York 10006
(212) 267-3700

=====

To
Attorney(s) for

=====

Service of a copy of the within
is hereby admitted.

Dated,

=====

Attorney(s) for

=====

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (certified) true copy of an
duly entered in the office of the clerk of the within named court on 20

NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy
will be presented for settlement to the HON. _____ one of the
judges of the _____
within named Court, at _____
on 20 _____ at _____ M.
Dated,

Yours, etc.,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

=====